

IN RE:	:	CHAPTER 13
HAROLD EUGENE CLARK, SR	:	
aka Harold Eugene Clark	:	CASE NO. 1:17-bk-02060
JACKQYLN DALE CLARK,	:	
Debtors	:	
	:	
HAROLD EUGENE CLARK, SR	:	
aka Harold Eugene Clark	:	
JACKQYLN DALE CLARK,	:	
Movants	:	OBJECTION TO CLAIM # 3
v.	:	
SANTANDER CONSUMER USA, INC.,	:	
Respondent/Claimant	:	

Case 1:17-bk-02060-HWV Doc 22 Filed 08/03/17 Entered 08/03/17 10:28:36 Desc
Main Document Page 1 of 5

(b) Renewal.--The effectiveness of perfection lapses on the expiration of the periods specified in subsection (a) unless a renewal form is filed within the six months immediately preceding expiration. Upon the timely filing of a renewal form, the effectiveness of perfection continues for a period of three years, commencing on the date on which perfection would have lapsed in the absence of the filing. Perfection may be renewed for as many three-year periods as may be necessary by the holder of the security interest upon a form furnished by the department, signed by the secured party and accompanied by the fee provided in this title.

(c) Corrected certificate when perfection expires.--A corrected certificate of title without a statement of liens or encumbrances shall be issued by the department, upon the request of the owner, when perfection of the security interests recorded on the certificate of title have expired. (July 10, 1984, P.L.679, No.146, eff. 60 days; Dec. 21, 1998, P.L.1126, No.151, eff. 60 days; June 8, 2001, P.L.123, No.18, eff. July 1, 2001; June 22, 2001, P.L.411, No.33, eff. 120 days)

5. The lien held by Santander expired on approximately February 20, 2013 and the obligation is no longer a claim secured by collateral of the Debtors.

6. The Debtors own the 1999 Lincoln free and clear of any encumbrances.

WHEREFORE, the Debtors hereby request that this Honorable Court enter an order disallowing and dismissing the claim.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
125 State Street
Harrisburg, PA 17101
717.232.6650 Tel
717.232.0477 Fax
doriemott@aol.com

**LOCAL BANKRUPTCY FORM 3007-1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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Debtors	:	
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	:	
SANTANDER CONSUMER USA, INC.,	:	
Respondent/Claimant	:	

TO:SANTANDER CONSUMER USA ("Claimant")

NOTICE OF OBJECTION TO CLAIM AND HEARING DATE Harold Eugene Clark, Srand Jackqyln Dale Clark have filed an objection to the proof of claim you filed in this bankruptcy case. Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not want the court to eliminate or change your claim, you or your lawyer must attend the hearing on the objection, scheduled to be held:

United States Bankruptcy Court Ronald Reagan Federal Building, Bankruptcy Courtroom (3rd Floor), Third & Walnut Streets PO Box 908 Harrisburg, PA 17108	Date: September 13, 2017 Time: 9:40 A.M.
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If you or your attorney do not attend the hearing on the objection, the court may decide that you do not oppose the objection to your claim. Attorney for Objector

/s/ Dorothy L. Mott
Dorothy L. Mott Law Office, LLC
125 State Street, Harrisburg PA 17101
717. 232.6650 Tel
717.232.0476 Fax
doriemott@aol.com
Attorney ID No. 43568

Date of Notice: August 3, 2017

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I, the undersigned, hereby certify that on August 3, 2017, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Case 1:17-bk-02060-HWV Doc 22 Filed 08/03/17 Entered 08/03/17 10:28:36 Desc
Main Document Page 4 of 5

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	:	
	:	

ORDER

UPON CONSIDERATION of the Objection to Proof of Claim filed by the Debtors, it is hereby

ORDERED that the claim of the Respondent is disallowed and dismissed